



USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #: _____

DATE FILED: 9/13/2022

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

DAVID S. THAYER
Assistant Corporation Counsel
t: (212) 356-2649
f: (212) 356-1148
e: dthayer@law.nyc.gov

September 12, 2022

The Honorable Analisa Torres
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Bird, et al. v. N.Y.C. Dep't of Educ., et al., Case No. 22 CV 2220 (AT)

Dear Judge Torres:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, the Honorable Sylvia O. Hinds-Radix, attorney for the Defendants in the above-referenced action. With the consent of Plaintiffs' counsel, I write to respectfully request an 11-day extension of the Defendants' time to submit their pre-motion letter in connection with the forthcoming briefing on motions for summary judgment.

The requested extension is necessary because I have only just been assigned to handle this matter after the departure of my colleague, Ms. Sherry Glover, Esq. As such, I must familiarize myself with the factual record in this matter and the intended bases for the DOE's motion for summary judgment. The requested extension will permit me time for a review of the history of this action to that end and to submit an appropriate pre-motion letter to the Court.

This is the Defendants' first request for an extension of their time to submit their pre-motion letter. As noted, Plaintiffs' counsel has graciously consented to this request. I apologize to the Court for the belated nature of this application, which is inconsistent with the Court's Individual Practices and is due to my recent assignment to the action.

GRANTED.

SO ORDERED.

Dated: September 13, 2022
New York, New York



ANALISA TORRES
United States District Judge